

1 MANUEL A. MEDRANO (SBN 102802)

mmedrano@zuberlawler.com

2 **ZUBER LAWLER & DEL DUCA LLP**

2000 Broadway Street, Suite 154

3 Redwood City, California 94063

Telephone: (650) 866-5901

4 Facsimile: (213) 596-5621

5 BRIAN J. BECK (*pro hac vice*, IL BN 6310979)

bbeck@zuberlawler.com

6 **ZUBER LAWLER & DEL DUCA LLP**

135 S. LaSalle St., Suite 4250

7 Chicago, Illinois 60603

Telephone: (312) 346-1100

8 Facsimile: (213) 596-5621

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

11
12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ONE PARCEL OF REAL PROPERTY
16 LOCATED AT 9414 PLAZA POINT DRIVE,
17 MISSOURI CITY, TEXAS 77459,

18 Defendant.

19 ROWLAND MARCUS ANDRADE,

20 Claimant.

21 SOLMAZ ANDRADE,

22 Claimant.

23
24 WILMINGTON SAVINGS FUND SOCIETY,
25 FSB as trustee for IRP FUND II TRUST 2A,

26 Claimant.

Case No. 3:20-cv-2013-RS

**RE-NOTICE OF MOTION OF
ROWLAND MARCUS ANDRADE FOR A
PROTECTIVE ORDER TO PRESERVE
EVIDENCE**

Judge: Hon. Richard Seeborg

Trial Date: None Set

Hearing Date: July 23, 2020, 1:30 p.m.

1 **TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** on July 23, 2020, at 1:30 p.m., or as soon thereafter as
3 counsel may be heard, in the courtroom of the Honorable Richard Seeborg, located in the United
4 States Courthouse, Northern District of California, San Francisco Courthouse, Courtroom 3 – 17th
5 Floor, Rowland Marcus Andrade (“Claimant”), by and through his attorneys, will and hereby does
6 move this Court for an order requiring the Plaintiff United States to preserve and produce all
7 evidence of any kind obtained through the governments’ investigation(s) into Claimant, Jack
8 Abramoff, Japheth Dillman, IRS Agent Bryan Wong, FBI Agent Ethan Quinn, FBI Agent Rohan
9 Wynar, and related parties, including but not limited to any search or seizure of Claimant
10 Andrade’s businesses, computers, home, or other property or that of Jack Abramoff, and/or
11 Japheth Dillman and any alleged associates of Andrade or Abramoff as it relates to the Complaint
12 and to all of the criminal offenses allegedly committed by Andrade and his associates.

13 This is a re-notice of the Motion of Rowland Marcus Andrade for a Protective Order to
14 Preserve Evidence filed on June 10, 2020, at Dkt. No. 31. The motion is being re-noticed as
15 required by the Clerk’s Notice re Reassigned Case entered at Dkt. No. 41 on June 30, 2020.

16 This Motion is based on this Notice of Motion; the Notice of Motion, attached
17 Memorandum of Points and Authorities, and the attached Declarations of Rowland Marcus
18 Andrade and Terry Landry previously filed on June 10, 2020, at Dkt. No. 31; the Reply in Support
19 of Motion of Rowland Marcus Andrade for a Protective Order to Preserve Evidence and Reply
20 Declaration of Rowland Marcus Andrade being served today; all of the pleadings, files, and
21 records in this proceeding, all other matters of which the Court may take judicial notice, and any
22 argument or evidence that may be presented to or considered by the Court prior to its ruling.

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1 Dated: July 1, 2020

Respectfully submitted,

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4 By: /s/ Brian J. Beck

5 MANUEL A. MEDRANO (SBN 102802)
6 *mmedrano@zuberlawler.com*
7 **ZUBER LAWLER & DEL DUCA LLP**
8 2000 Broadway Street, Suite 154
9 Redwood City, California 94063
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13 *bbeck@zuberlawler.com*
14 **ZUBER LAWLER & DEL DUCA LLP**
15 135 S. LaSalle St., Suite 4250
16 Chicago, Illinois 60603
17 Telephone: (312) 346-1100
18 Facsimile: (213) 596-5621

19 *Attorneys for Claimant*
20 *Rowland Marcus Andrade*
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